

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:22-CV-22787-SCOLA/GOODMAN

LIORA SAMANDAROVA,

Plaintiff,

vs.

HOOKAH EXOTIX LLC,
JEAN-CHRISTOPHE PITTMAN,
AND ALEXANDRE ARKHIPOV,

Defendants.

_____ /

DECLARATION OF LIORA SAMANDAROVA

LIORA SAMANDAROVA states the following under oath:

1. My name is Liora Samandarova, and I have personal knowledge of the facts herein.
2. I am a resident of Florida, over 18 years old and am *sui juris*.
3. Defendants, Hookah Exotix LLC, Jean-Christophe Pittman and Alexandre Arkipov, lured me to the United States to do office work for their hookah lounge.
4. Defendants promised that I would be paid \$1,000.00 a month to do marketing and promoting.
5. However, once I got the job, I was also required to sell hookahs to customers at the lounge; essentially, I was also required to work as a server.
6. I worked for the Defendants from May 1, 2022 through June 30, 2022, which is eight-and-a-half (8.5) weeks.
7. I never received the \$1,000.00 a month in compensation, and instead ended up paying rent to the Defendants under false pretenses because they promised me a place to live, which turned out to be a lie as well.

8. I am owed \$2,000.00 for the two months that I worked for the Defendants doing office work.

9. I worked an average of 64 hours a week during those 8.5 weeks, but I was never paid any minimum wages.

10. I should have earned \$464.00 in minimum wages each week calculated as 64 hours a week times \$7.25 an hour as minimum wage (64 x \$7.25).

11. I am owed approximately \$3,944.00 for the time I worked calculated as \$464.00 times 8.5 weeks (\$464.00 x 8.5).

12. Furthermore, I was never paid any overtime wages while working for the Defendants.

13. I worked 24 hours a week in overtime each week.

14. I should have made \$15.00 an hour in overtime based on Florida's minimum wage of \$10.00 an hour.

15. Therefore, I should have made \$360.00 a week in overtime (24 x \$15.00).

16. I should have made \$3,060.00 in overtime over the 8.5 weeks I was employed (8.5 x \$360.00).

17. Based on the contract I had with the Defendants, I am owed **\$2,000.00** for each month that I performed office work, **\$3,944.00** in unpaid minimum wages, plus **\$3,060.00 in** overtime wages, for a total of **\$9,004.00**.


18. The Defendants also owe me **\$7,004.00** in liquidated damages for the unpaid minimum and overtime wages.

19. Overall, I am owed **\$16,008.00** in wages and liquidated damages, exclusive of attorneys' fees and costs.

20. I further hired FairLaw Firm to represent me in this matter, and I am obligated to pay them attorneys' fees and costs for prosecuting this matter.

21. I also seek recovery of my attorneys' fees and costs from Defendants.

Under penalties of perjury, I declare that I have read the foregoing Declaration and the facts stated in it are true.



Liora Samandarova (Feb 23, 2023 10:59 EST)
Liora Samandarova
Dated 02/23/2023